IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

EERIK HEINE, Plaintiff,	)	
v.	)	
JURI RAUS, Defendant.	)	Civil Action No. 15952

A F F I D A V I T

Richard Helms, Deputy Director of Central Intelligence, being first duly sworn, deposes and says that:

1. Under the Director's Delegation of Authority to the Deputy Director of Central Intelligence, dated 28 April 1965, a copy of which is attached, I have been delegated all authorities vested in the Director of Central Intelligence in his position as Director of Central Intelligence and head of the Central Intelligence Agency including those authorities set forth in Central Intelligence Agency Regulation HR 10-20, a copy of which is attached.

2. I have familiarized myself with the allegations contained in the complaint in the above-entitled case.

3. I have familiarized myself with the Central Intelligence Agency's participation in communicating information concerning Eerik Heine to representatives of the Estonian emigre community in the United States.

4. During the periods of time specified in paragraphs 5, 6, and 7 of the complaint, the defendant, Juri Raus, was employed as a highway research engineer for the Office of Research and Development, Bureau of Public Roads, United States Department of Commerce.

5. During the same periods of time, the defendant was the National Commander of the Legion of Estonian Liberation, Inc., and was familiar with Estonian emigre activities.

6. For a number of reasons, including his past history and his position as National Commander of the Legion of Estonian Liberation, the defendant has been a source to this Agency of foreign intelligence information pertaining inter alia to Soviet Estonia and to Estonian emigre activities in foreign countries as well as in the United States.

7. The Central Intelligence Agency has employed the defendant from time to time -- concurrently with his duties on behalf of the Bureau of Public Roads -- to carry out specific assignments on behalf of the Agency. Defendant was so employed on those occasions specified in paragraphs 5, 6, and 7 of the complaint.

8. On those occasions specified in paragraphs 5, 6, and 7 of the complaint, the defendant was furnished information concerning the plaintiff by the Central Intelligence Agency and was instructed to disseminate such information to members of the Legion so as to protect the integrity of the Agency's foreign intelligence sources. Accordingly, when Juri Raus spoke concerning the plaintiff on the occasions about which complaint is made, he was acting within the scope and course of his employment by the Agency on behalf of the United States.

9. On May 29, 1963, prior to the occasions specified in paragraphs 5, 6 and 7 of the complaint, the defendant signed a Secrecy Agreement with the Agency, a copy of which is attached, which Agreement is still in full force and effect.

10. After a personal review of the Agency's activities pertaining to Eerik Heine, I have reached the judgment on behalf of the Agency that it would be contrary to the security interests of the United States for any further information pertaining to the use and employment of Juri Raus by the Agency in connection with Eerik Heine to be disclosed, other than the disclosures already made in the defendant's answer, my own affidavits, and the defendant's affidavits, which I have read.

11. Acting pursuant to the authority lodged in the Director of Central Intelligence by virtue of the provisions of Title 50, United States Code, Sections 403d and 403g, and the implementing Regulations promulgated thereunder, I have determined that it would be contrary to the national interest and would further compromise the proper protection of intelligence sources and methods to disclose further information in regard to those material matters which the plaintiff has sought to have revealed through his pleadings. I am herewith directing Juri Raus to make no further disclosures concerning his

employment by the Agency or relating to this matter without specific authorization by proper officials of the Central Intelligence Agency.

Richard Helms

Richard Helms

Attachments as stated.

STATE OF VIRGINIA)
) ss.
COUNTY OF FAIRFAX)

Subscribed and Sworn to before me this 1st day of April, 1966.

Edward R. Stockton Jr.

Notary Public

My commission expires 24 September 1969.

(SEAL)